

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

TYREE BELL,)
)
 Plaintiff,)
)
 v.) Case No. 4:17-cv-695-DGK
)
 OFFICER PETER NEUKIRCH, et al.,)
)
 Defendants.)

JOINT MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL

Plaintiff Tyree Bell and Defendants Neukirch, Munyan, Ortiz, Mattivi, Smith and the Members of the Kansas City Board of Police Commissioners respectfully request leave to file Plaintiff's Exhibits 9, and 12 to Plaintiff's Response in Opposition to Defendants' Motion for Summary Judgment under seal and to retroactively designate Defendants' Exhibits U and Z as filed under seal.

Plaintiff's Exhibits 9 and 12 and Defendants' Exhibits U and Z are video files which are not encompassed by the specific terms of the Court's Protective Order¹ in this cause. However, they contain video and audio which could compromise the safety of current police officers and their effectiveness in their assigned roles. Counsel for Plaintiff and Defendants conferred over the weekend and agree that for those reasons these exhibits are appropriately filed under seal.

Defendants' Exhibits U and Z have already been filed with the clerk on a DVD.

¹Doc. 11, November 14, 2017.

Plaintiff's Exhibits 9 and 12 have also been copied onto a DVD and it is anticipated that they will be filed conventionally and maintained in the case file in the Clerk's office with a second copy provided for chambers.

Respectfully submitted,

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